



Cannabis Control Division

August 10, 2026

INDUSTRY BULLETIN: 26-08

Upcoming Transition to New State-Mandated Track-and-Trace System

As previously announced in Industry Bulletin 26-06, the Cannabis Control Division (CCD) is preparing to transition from BioTrack to the New Mexico Seed-to-Sale System (NMS2S), the state's successor state-mandated seed to sale track-and-trace system. CCD is working with the successor track-and-trace provider, Real Time Solutions (RTS), to finalize the transition process and implementation timeline. Migration is expected to begin at the end of the day on August 25, 2026, with launch currently anticipated during the first week of September 2026.

Licensee Pre Migration Preparation

As part of the transition, licensees are encouraged to review their inventory and track-and-trace records to help ensure that information maintained in BioTrack is accurate and up to date. Successful data migration depends, in part, on the accuracy and completeness of these records. This information will form the basis of each licensee's inventory in the successor system.

Licensees should take this opportunity to review and reconcile their BioTrack inventory, resolve any outstanding discrepancies or incomplete transactions, and ensure that their records accurately reflect their current physical inventory in advance of the anticipated August 25, 2026, migration.

In preparation for migration, licensees should:

- Reconcile physical inventory against track-and-trace inventory and address any discrepancies in accordance with applicable requirements.
- Review plants, packages, harvests, and other tracked inventory to ensure that records accurately reflect the current status and location of cannabis and cannabis products.
- Close or complete outdated records that are no longer active but remain open in the system, where appropriate.
- Review transfers and other outstanding transactions to ensure completed activity has been accurately recorded.
- Review license and facility information maintained in the system and identify information that appears inaccurate or outdated.
- Avoid the unnecessary accumulation of unresolved records or data discrepancies as the transition date approaches.
- Ensure appropriate employees are familiar with current inventory records and are prepared to assist with reconciliation before and after the transition.

Licensees should not make adjustments solely for purposes of preparing for migration unless the adjustment accurately reflects the licensee's inventory or activity and is otherwise permitted under applicable requirements.

User Accounts and Initial System Administrator:

Existing BioTrack user accounts will not be migrated to the successor track-and-trace system. New user accounts will need to be created within the successor system.

At launch, the primary controlling person identified in the licensee's NM-PLUS account will be established as the initial system administrator for the license. The system administrator will then be responsible for establishing and managing appropriate user access for the licensed business.

Licensees should review their NM-PLUS account now to ensure that the primary controlling person information is accurate and current and make any relevant updates as soon as possible before the transition.

Synchronization:

As the migration period approaches, it is very important to ensure that

your BioTrack account is fully synchronized. BioTrack traceability is currently the source of truth for track-and-trace inventory, and only data reflected in BioTrack will be migrated to the successor system. Licensees using third-party point-of-sale or inventory management systems should ensure that information maintained in those systems is properly synchronized with BioTrack.

CCD recommends that licensees run a “Current Inventory” report directly from BioTrack Traceability and use that report when reviewing and reconciling their tracked inventory in preparation for migration.

Post Migration Changes to Workflows and System Functionality

The successor track-and-trace system, NMS2S, is designed to more closely align system workflows and functionality with existing regulatory requirements. As a result, certain functions that were previously available or less restricted within BioTrack may operate differently in the successor system. Licensees are reminded that the availability of a function within BioTrack did not, by itself, authorize activity that was otherwise inconsistent with applicable statutes or rules.

Licensees should be aware of the following system and workflow changes as they prepare for the transition:

Courier Tracking:

Couriers will be provided with track-and-trace accounts, allowing cannabis deliveries involving couriers to be tracked directly within the state-mandated track-and-trace system. Deliveries made using licensed couriers or a licensee’s internal couriers will be required to be tracked through the system.

Producer Inventory Changes:

Inventory associated with a production license will be limited to maintaining the following inventory types: Deli Style Cannabis, Bulk Flower, Bulk Trim, Clones, Seedlings, and Seeds. Existing producer inventory will be migrated to the successor system as currently recorded; however, following the transition, producers will no longer be able to receive inventory types other than those identified above.

Testing:

The successor track-and-trace system will more clearly distinguish products that are ready for retail sale from products that remain in cultivation, manufacturing, or processing. Sale-ready products will be identified as either “Packaged Products” or

“Deli Style Flower.” Before a product can be converted to one of these sale-ready product types, the applicable testing requirements must be completed.

A finished product test that meets the compliance requirements set forth in 16.8.7.15 NMAC will be required before a package may be transferred to a retail location.

Licensees should be aware that testing applies to the product in the form in which it will be transferred for retail sale. If a tested

product subsequently undergoes additional processing or otherwise changes form, including through the addition of new ingredients, the resulting product will require a new finished product test before it can be designated as a sale-ready product and transferred to a retail location.

Additional Transition Information:

CCD is working with the successor track-and-trace provider, Real Time Solutions (RTS), to finalize the transition process and implementation timeline.

Anticipated System Downtime:

CCD anticipates that some track-and-trace system downtime will be necessary as part of the migration from BioTrack to NMS2S. CCD and RTS are working to minimize the duration of any downtime and reduce impacts to licensee operations to the greatest extent possible. Information regarding the anticipated timing and duration of system downtime, along with instructions for licensee operations during the transition period, will be provided as migration planning is finalized.

API and Third-Party Integrations:

CCD and RTS are working to support third-party retail point-of-sale (POS) integrations upon launch of NMS2S. Additional API functionality supporting inventory integrations is expected to be made available shortly after launch.

Training and Support:

CCD and RTS are finalizing user manuals, training materials, and other resources to assist licensees with the transition to and use of NMS2S. These materials will include guidance regarding system access, workflows, and functionality. CCD and RTS are also preparing additional support resources to assist licensees throughout the transition and following launch. Training materials and information regarding available support resources will be shared with licensees as soon as they are finalized.

Future Communications:

CCD is working to add a dedicated Track-and-Trace Transition page to its website where licensees and other stakeholders can access transition updates, guidance, training

materials, and other resources related to NMS2S. CCD will also continue to provide important transition updates through GovNotice Industry Bulletins sent to the email addresses maintained in NM-PLUS for licensees. Licensees are encouraged to monitor these communications and the CCD website regularly throughout the transition.

We recognize that transitioning to a new statewide track-and-trace system is a significant undertaking for licensees. CCD and RTS continue to work closely to finalize NMS2S and prepare for the upcoming transition, and both teams will remain focused on minimizing disruption and making the transition as smooth as possible. We appreciate the continued cooperation and engagement of licensees and stakeholders and look forward to introducing NMS2S and supporting the industry throughout the transition.

New Mexico Regulation & Licensing Department

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